

WOLFF & SAMSON PC
THE OFFICES AT CRYSTAL LAKE
ONE BOLAND DRIVE
WEST ORANGE, NEW JERSEY 07052
973-325-1500
ATTORNEYS FOR DEFENDANT, ADVANCED ENVIRONMENTAL TECHNOLOGY CORP. (TS-6491)

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BOARHEAD FARM AGREEMENT GROUP,

Plaintiff,

v.

ADVANCED ENVIRONMENTAL
TECHNOLOGY CORPORATION, et al.,

Defendants.

Civil Action No. 02-3830 (LDD)

**DEFENDANT AETC'S MOTION TO
OVERRULE OBJECTIONS AND
COMPEL PLAINTIFF BOARHEAD
FARM AGREEMENT GROUP TO
RESPOND TO AETC'S DISCOVERY
REQUESTS**

PLEASE TAKE NOTICE that as soon as counsel may be heard, Wolff & Samson PC the undersigned counsel for Defendant, Advanced Environmental Technology Corporation ("AETC"), shall move before this Court, pursuant to Fed. R. Civ. R. 37(a), to overrule the objections of Plaintiff Boarhead Farm Agreement Group ("BFAG") to AETC's Initial Set of Interrogatories and Document Demands ("AETC's Discovery Requests"), and to compel BFAG to respond to certain interrogatories and requests for production of documents contained in AETC's Discovery Requests.

PLEASE TAKE FURTHER NOTICE that in support of the within application, Defendants shall rely upon the accompanying Memorandum of Law and Declaration of Thomas Sabino;

PLEASE TAKE FURTHER NOTICE that oral argument is not requested, unless opposition is filed.

WOLFF & SAMSON PC
The Offices at Crystal Lake
One Boland Drive
West Orange, New Jersey 070552-3698
Attorneys for Defendant, Advanced
Environmental Technology Corp.

November 29, 2004

By: /s/ Thomas Sabino
THOMAS SABINO